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October 17, 2005

VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Notice of Ex Parte Presentation in CC Docket Nos. 96-45, 98-171, 92-237,
99-200, 95-116, 98-170, and NSD File No. L-00-72

Dear Ms. Dortch:

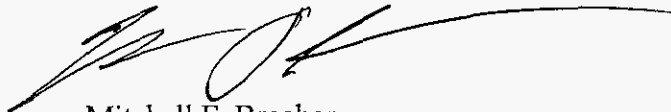
On October 17, 2005, F. J. Pollak, President and Chief Executive Officer of TracFone Wireless, Inc., and I met with Thomas Navin, Chief, Wireline Competition Bureau, and with Cathy Carpino, Greg Guice, Narda Jones, Jeremy Marcus, and Carol Pomponio, all of the Wireline Competition Bureau Telecommunications Access Policy Division.

During the meeting, we reiterated positions TracFone has taken in its filed comments and prior ex parte submissions in the Universal Service Contribution Methodology proceeding. Specifically, we discussed why replacement of a revenues-based contribution methodology with a methodology based on working telephone numbers would produce significant dislocations to providers of prepaid wireless services and consumers of the services provided by prepaid wireless carriers. We also discussed the importance of addressing the unique circumstances of the prepaid wireless industry in any plan which revises the contribution methodology. Specifically, we discussed the fact that prepaid wireless services are comparable to wireline prepaid calling card services in that in both cases there is no mechanism for seeking reimbursement of the providers' universal service contribution assessments from consumers since there is no billing relationship between the service provider and the end user. Based on those similarities, we suggested that the Commission allow providers of non-billed services, such as prepaid wireline and wireless providers, to continue to contribute to the Universal Service Fund based on their interstate telecommunications service revenues.

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Pursuant to Section 1.1206(b) of the Commission's rules, this notice is being filed electronically in the above-captioned dockets. If you have questions regarding this matter, please communicate directly with undersigned counsel for TracFone.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Brecher', with a long horizontal flourish extending to the right.

Mitchell F. Brecher

cc: Mr. Thomas Navin
Ms. Cathy Carpino
Mr. Greg Guice
Ms. Narda Jones
Mr. Jeremy Marcus
Ms. Carol Pomponio